



# CITY OF SNOHOMISH

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## PLANNING AND DEVELOPMENT SERVICES DEPARTMENT REPORT TO THE HEARING EXAMINER FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

**Project File Number:** 06-15-CUP      **Project Name:** Verizon Wireless Facility

**Request:** Approval of a **Conditional Use Permit (CUP)** to construct an unmanned wireless facility on a 4.43 acre, City-owned property at 402 Second Street.

**PROPONENT/CONTACT:**

Frank Mandt  
Vinculum Services, Inc.  
3301 Burke Avenue N, #100  
Seattle, WA 98103  
(425)941-0410

**Hearing Date, Time, and Place:**      **July 31, 2015, at 10:00 a.m.**  
Snohomish Fire District Harvey Auditorium  
1525 Avenue D  
Snohomish, Washington

**Location:** 402 Second Street, Snohomish, Washington 98290

**Land Use Designation:** Public Park

**Application Complete:** April 22, 2015

**Date report transmitted to Hearing Examiner:** July 23, 2015

**Staff report author:** Brooke Eidem, Associate Planner

**Contributing staff to this review:**

- Owen Dennison, Planning Director
- Andrew Sics, Project Engineer
- Eric Fournier, Administrative Sergeant, Snohomish Police Department
- Denise Johns, Parks Project Manager
- Sharon Pettit, Building/Fire Official

**Attachments as part of the record:**      A. Applicable Comprehensive Plan policies

## **A. FINDINGS**

### **1. Requested action and project description**

The requested action is approval of a conditional use permit for construction and operation of an unstaffed wireless facility consisting of seven cabinets and one 30 kW natural gas generator, within a 750 square foot addition to the northeast portion of the existing Boys & Girls Club building. A 12-panel antenna array and associated equipment and accessories are proposed to be installed on a 100-foot monopole, which will extend from the building addition. The facility will be designed to accommodate collocation of two additional cellular carriers.

According to available records, this portion of the overall site was developed as a youth activity center in 2003. The facility is operated by the Boys & Girls Club of Snohomish County, a non-profit organization, and the property is owned by the City. The adjacent skate park was completed in 2002. The use of the site will remain unchanged, and no other site improvements are proposed that will affect existing recreational uses. The building addition will be located on the rear of the Boys and Girls Club structure, attached to the existing north wall. As proposed, the addition will match the existing structure in design and materials.

No City utilities will be necessary to serve the proposed facility. Electric power and natural gas for the emergency generator are available at the existing building. (Exhibits 2, 6, and 7)

### **2. Common and Legal Property Description**

The site is addressed as 402 Second Street, Snohomish, on Snohomish County Assessor tax parcel 28061800402200 in the southeast quarter of Section 18, Township 28 North, Range 6 East, W.M., in Snohomish County, Washington. The overall site in contiguous City ownership, extending from Second Street to Third Street, is comprised of four tax parcels. (Exhibit 27) The legal description provided by the applicant is provided on sheet 3 of Exhibit 7.

### **3. Comprehensive Plan Land Use Designation and Existing Zoning**

The site is designated Public Park (PP) on the City's Land Use Designation Map. The PP designation has no specific policies in the Comprehensive Plan Land Use Element, however Public Land Use (PA) policies are applicable, as the property is publicly-owned. The Parks Element addresses park land. PP development (zoning) regulations are located in the Snohomish Municipal Code (SMC).

As discussed in the Comprehensive Plan Parks Element and SMC 14.205.090, the PP designation is intended primarily for public recreational development. Communication facilities are identified as compatible—or potentially compatible—with the intent of the Parks land use designation according to the Land Use Tables in Chapter 14.207 SMC.

#### 4. General Property Information (subject parcel existing conditions)

<b>Existing Land Use</b>	
Subject Site	Boys & Girls Club of Snohomish County
Property to North	Skate Park, vacant Hal Moe pool building
Property to South	Commercial (across Second Street)
Property to East	Commercial (across Pine Avenue)
Property to West	Public trail corridor, commercial
<b>Comprehensive Plan and Zoning Map Designation</b>	
Subject Site	Public Park
Property to North	Public Park
Property to South	Pilchuck District (across Second Street)
Property to East	Pilchuck District (across Pine Avenue)
Property to West	Public Park, Pilchuck District
<b>Existing Vegetation</b>	
The project site is primarily maintained lawn with deciduous trees adjacent to Pine Avenue and Second Street.	
<b>Existing Topography</b>	
The project site is flat. (Exhibits 7 and 25)	
<b>Critical areas</b>	
No critical areas have been identified.	

#### 5. Land Development Regulations (Title 14 SMC) applying to this request

The following provisions of the Snohomish Municipal Code have particular relevance to this proposal. These provisions and all of SMC are incorporated herein by reference:

Chapter 14.50 SMC, Type 6 (SEPA-Applicable Conditional Use Permits)  
Chapter 14.65 SMC, Amendments (Conditional Use Permits)  
Chapter 14.95 SMC, Hearing Examiner  
Chapter 14.100 SMC, Definitions  
Chapter 14.205 SMC, Permitted Land Uses  
Chapter 14.207 SMC, Land Use Tables  
Chapter 14.210 SMC, Dimensional and Other Requirements  
Chapter 14.230 SMC, Design Standards Outside Historic District  
Chapter 14.235 SMC, Off-Street Parking, Loading, and Access Requirements  
Chapter 14.295 SMC, Traffic Impact Fees (Concurrency)

##### Chapter 14.100 SMC, Definitions

The proposed wireless facility is classified as a communication facility-major in the development regulations of the Snohomish Municipal Code. Chapter 14.100 SMC defines the use as a “structural and/or freestanding tower facility for transmission and reception of UHF and VHF television signals, commercial FM or AM radio signals, or cellular radio signals.”

#### Chapter 14.207 SMC, Land Use Tables

The site is designated Public Park (PP) on the Comprehensive Plan Land Use Designation Map and for the purposes of land use regulation. Communications facilities-major are listed as a conditional use in the Land Use Tables in Chapter 14.207 SMC. SMC 14.207.125 lists two specific conditions applicable to communications facilities in the PP zone. The first relates to adding facilities to existing utility towers and does not apply to this proposal. The second states that new facilities shall not interfere with the use of the property for recreational purposes.

The proposed facility will be located in the rear of the Boys and Girls Club building in an unprogrammed area of the site adjacent to the skate park. The area adjacent to the north building wall and the east wall of its northern projection is 45-foot by 50-foot (2,250 square feet), of which the proposed addition will encompass a 30-foot by 25-foot area (750 square feet). Youth activities are conducted elsewhere on the site, and therefore staff believes that the new facility will not interfere with the existing recreational use of the site.

#### Chapter 14.210 SMC, Dimensional and Other Requirements

Dimensional standards for most land use designations are located in SMC 14.210.330, which provides a maximum building height of 35 feet in the PP designation but refers to SMC 14.210.235 for setback and lot coverage standards. The PP designation is unique among zoning designations in that some dimensional standards are intended to be prepared on a site-specific basis when development of a PP designated park is proposed. SMC 14.210.235 establishes the process and considerations for the City Planner's determination of applicable site-specific standards. SMC 14.210.235B directs the City Planner to make the determination based on existing and proposed land uses and facilities, nearby development regulations, and "limitations or controls upon construction, land use, environmental protection, transportation systems, etc. warranted to minimize the potential for unmitigated adverse impacts, and establish written dimensional standards applicable to the subject property." The City Planner's determination of applicable regulations is contained in the project file. (Exhibit 17) While the height of the tower appears to be a concern of members of the community, SMC 14.210.180B exempts utility towers and poles from the building height standard in all land use designations. No separate height standard is adopted that would apply to structures exempted from the building height standard.

The proposed building addition, which will enclose the base of the monopole and emergency back-up generator, will be located at the northeast portion of the subject parcel within a building recess, and will not extend closer to property lines than the existing building walls. The height will be approximately 14 feet at the peak of the shed roof, attached to the wall of the existing structure. The City Planner's determination of applicable standards incorporates the setbacks of the existing Boys and Girls Club building as the standards applicable to the proposed facility. The increase in lot coverage and the corresponding reduction in landscaped area are determined to be negligible and therefore the applicable lot coverage standard is determined to be the same as a liberal estimate of existing lot coverage. According to staff's analysis, the proposal complies with the dimensional standards in SMC 14.210.330 and the standards determined applicable under SMC 14.210.235.

#### Chapter 14.230 SMC, Design Standards Outside Historic District

Pursuant to SMC 14.230.030, buildings or facilities located outside the Historic District are subject to administrative design review. Findings of consistency with applicable Design Standards were issued by the City Planner on June 24, 2015. (Exhibit 16)

#### Chapter 14.235 SMC, Off-Street Parking, Loading, and Access Requirements

Chapter 14.235 SMC provides minimum standards for provision of off-street parking by land use. Communication facilities-major requires one space per every two employees on maximum shift, per SMC 14.235.220. The subject proposal is for an unstaffed facility. Therefore, no additional off-street parking is required.

#### Chapter 14.240 SMC, Landscaping, Screening, Fencing, and Retaining Walls

SMC 14.240.030B requires that a landscape plan be approved before any site clearing, grading, or removal of significant trees occurs. The project area is currently lawn, with adjacent arborvitae west of the project site. No trees are proposed for removal and no additional landscaping is proposed. The eastern portion of the site, adjacent to Pine Avenue, is currently landscaped in deciduous trees. Staff is proposing a condition to require three additional evergreen trees in the vicinity of the project site to reduce the visual prominence of the monopole (see section 9, item 3 below).

#### Chapter 14.295 SMC, Traffic Impact Fees and Mitigation

As an unmanned facility, the development will function in a similar manner to a utility pole; the impact on the street system will be de minimus. According to sheet T-2 of Exhibit 7, a Verizon Wireless maintenance crew is anticipated to visit the site once per month, for a total of one hour per visit. The crew will typically consist of one person. The City Engineer has evaluated the proposal and determined concurrency requirements are generally inapplicable to this project, as it will not generate employment or resident trips. Level of Service of nearby intersections will not be adversely affected. Traffic impact fees are not required. (Exhibit 15).

### **6. Public Notice and Comment**

The City provided notice of application, SEPA determination, and the public hearing, as required by statute and City ordinance. The City has received public comment via email from four members of the community regarding the project (Exhibits 18, 20, 21, and 22). The residents expressed several concerns with the proposal, although the primary perceived issue is that the pole is architecturally out of scale with the town and will be an imposing presence with a detrimental effect on the character of the community. Several commenters suggested exploring other options, namely a Distributed Antenna System (DAS) rather than a monopole. A DAS is comprised of small-scale, dispersed antenna facilities attached to buildings or utility poles. As the height is lower than a pole, more units are required to achieve the same line-of-sight coverage. In response to the comments, staff contacted the applicant requesting information on a DAS. The applicant responded that a DAS is insufficient for the location, as it is typically used for in-building antenna systems. It is staff's interpretation that a DAS would be defined as a communication facility-minor, which is regulated differently than a communication facility-major. Therefore, from the standpoint of the development code in Title 14 SMC, a DAS is a separate use from a monopole, although both provide the same service. (Exhibit 19)

An email was received from the Environmental Protection Agency, evidently in response to the SEPA notice, requesting information on potential health and safety risks to child visitors to the Boys and Girls Club from the antennas and the emergency generator. Per 47 U.S. Code § 332(c)(7), the City may not regulate the placement or construction of a wireless facility based on the environmental effects of radio frequency emissions to the extent the facilities comply with the Federal Communications Commission's (FCC's) regulations. (Exhibit 14)

## **7. Existing site and improvements**

The subject parcel is flat and contains an existing building totaling approximately 16,444 square feet that is used as the Boys & Girls Club of Snohomish County youth activity facility. The proposed project site is located in the rear of the existing building, in an area of maintained lawn. The west side of the site is a portion of a larger parking area which extends northward through the City-owned property. Adjacent street frontages have existing deciduous street trees of approximately 20 feet in height.

## **8. State Environmental Policy Act (SEPA) Review**

The SEPA Threshold Determination was issued on May 6, 2015. No appeals were filed. (Exhibit 10 and 11.)

## **9. Analysis of the proposed conditional use permit**

The criteria for conditional use permit approval is specified by SMC 14.65.020B. Staff's evaluation of the project follows each criterion:

1. *Adequate streets, sidewalks, transit stops, open spaces, parks, schools, water, sewer, and stormwater facilities shall be available to the proposed development.*

As an unoccupied facility, the proposal will function in a similar manner to a utility pole or substation, and will generate only occasional maintenance visits. Sidewalks, public transit, open spaces, parks, schools, and public utilities are currently adequate for the demands of the proposed use. Temporary access during construction will be from Pine Avenue, the street nearest the building site. Water and sewer utilities will not be required. The City currently provides police services to the site. Fire suppression services are provided by Snohomish County Fire District 4. Power is provided by the Snohomish County Public Utility District #1 and natural gas is provided by Puget Sound Energy. The Boys and Girls Club building is currently connected to electric and natural gas systems.

2. *The design and appearance of the structure shall be compatible with surrounding developments that are in conformance with the land use designation.*

Requirements for design review for development outside the Historic District are established in Chapter 14.230 SMC. The proposal does not meet the exemptions from

review in SMC 14.230.040. The proposal was evaluated for consistency with the Design Standards and Guidelines (Outside of the Historic District). The City Planner issued a determination of consistency with the applicable design standards. (Exhibit 16)

The proposed housing of the ground equipment has been designed to match the existing building. A 100-foot monopole is unlikely to be consistent with surrounding development in any land use context.

3. *The development shall be consistent with the Comprehensive Plan.*

The subject property is designated Public Parks on the Comprehensive Plan Land Use Map. Attachment A contains the Comprehensive Plan policies that are relevant to this project.

Policy ED 10.1 directs the City to work with property owners, residents, and other parties for development of infrastructure and utilities, including telecommunications. By its context, the policy is interpreted to encourage improvements that increase reliability of infrastructure, including telecommunications facilities. However, the assumption appears to be that infrastructure will improve residents' quality of life, which has been questioned by members of the public.

Policy CO 4.6 directs development of public facilities to promote public safety through the use of modern design and construction practices. Although the site is publicly owned, the proposed facility is a private development, so the policy is only marginally applicable. Construction will be required to comply with all applicable building codes and regulations pertaining to public safety. The base of the pole and its associated equipment and accessories are housed within an addition to the main structure on the site. This element of the proposal is both a safety measure and a visual enhancement to reduce the aesthetic impact of the pole at ground level.

Policy PRO 4.7 is the only Comprehensive Plan policy that provides specific direction regarding the proposed cellular facility. It states that "aerial utilities and telecommunication transmission infrastructure that result in unmitigated adverse impacts are prohibited." By its context in the Parks Element of the Comprehensive Plan, the policy is interpreted to direct considerations of adverse impacts to the park in which it is located. According to staff's analysis, the proposal will not displace current recreational uses or planned future activities or amenities in the project area of the larger site. The building addition will screen the facility and associated equipment from view, restrict access, and dampen potential noise from the generators. Staff recommends a condition to install three evergreen trees in the vicinity of the proposed addition to further reduce the visual impact of the pole within the park and from adjacent areas. The larger question of whether the presence of a 100-foot monopole will have an unmitigated adverse impact on the visual character of the community overall is not addressed in the policy.

Policy UT 4.5 encourages system design practices intended to minimize the number and duration of interruptions to customer utility service. The applicant has stated the purpose

of the project is to enhance coverage and improve service reliability to cellular customers in the community. (Exhibit 5)

4. *The development shall mitigate any significant adverse environmental impacts.*

The City issued a Determination of Non-Significance for the project on May 6, 2015. The SEPA Responsible Official has determined that the proposal will not result in unmitigated significant adverse impacts to the environment. Per 47 U.S. Code § 332(c)(7), the City may not regulate the placement or construction of a wireless facility based on the environmental effects of radio frequency emissions to the extent the facilities comply with the FCC's regulations. Staff recommends a condition of approval to require documentation that radio frequency emissions comply with the FCC's regulations or documentation of categorical exemption from environmental evaluation.

The perceived adverse impacts of the facility on the character of the community are more challenging to address. It is clear that the pole will be visible for an extended distance around the project site. The proposed building addition and recommended conditions of approval will reduce visual impacts on and near the site to some extent. Proposed and recommended measures will not, however, reduce the prominence of the monopole from many viewpoints in the community. The applicant has stated that a minimum height of 80 feet is necessary to meet the functional requirements of the facility due to the height of vegetation in the vicinity. By implication, an 80-foot monopole would minimize or preclude opportunities for collocation of other carriers on the facility. It is staff's assessment that a 20-foot reduction in height would have little effect on the prominence of the tower relative to the height of structures in the vicinity of the site and that precluding collocation of other carriers may have the result of requiring other carriers to propose additional monopoles. Federal preemptions in 47 U.S. Code § 332(c)(7) also precludes local regulatory authorities from implementing regulations that "have the effect of prohibiting the provision of personal wireless services". According to staff's analysis, grounds for denial of the application at the proposed location based on the prominence of the monopole and resulting visual impacts would be similarly applicable to other locations in the vicinity of the site and therefore may be construed as having the effect of prohibiting the provision of wireless services. (Exhibit 23)

5. *Concurrency requirements (SMC 14.55.030) shall be complied with.*

The City Engineer has determined that the proposal is consistent with traffic concurrency requirements of SMC 14.55.030. (Exhibit 15)

6. *The development shall be consistent with the health, safety, and general welfare.*

The proposed use will improve reliability for cellular users in the vicinity, with capacity to add additional carriers to the same facility. Preserving the opportunity for collocation may decrease the potential number of wireless monopoles in the community while improving service for a wider number of users.



The facility has been designed to limit potential safety hazards at the site. The base of the pole and associated equipment will be located within a fully enclosed building, to restrict public access and screen equipment from view at ground level. Under federal law, local government is prohibited from regulating “the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission’s regulations concerning such emissions”.

The proposed building will create an area of about 17 feet wide by 25 feet deep between the proposed addition and the existing east wall of the northern building projection. The limited viewpoints for surveillance of this area, particularly from the public street, may result in opportunities for unsafe and potentially criminal activities. (Exhibit 24) Staff recommends a condition to require extending the addition to connect to the existing building wall to enclose this area. This will require relocating the gas meters and installing a secure door for access. Additionally, the extension will require adequate ventilation for existing mechanical equipment.

## **B. CONCLUSIONS**

Staff recommends approval of the proposed wireless facility, at a minimum subject to the conditions below, as consistent with the City’s development regulations and Comprehensive Plan.

## **C. RECOMMENDATION**

SMC 14.65.020C authorizes the City to impose conditions of approval to protect the health, safety, and general welfare. The City Planner recommends the Hearing Examiner approve the Conditional Use Permit for Vinculums Services, Inc., on behalf of Verizon Wireless with the following conditions:

1. Project activities shall comply with all applicable federal, State, and local regulations.
2. Prior to operation of the facility, the applicant shall propose and implement a landscape plan to install three evergreen trees in the vicinity of the proposed pole. The tree species shall have a mature height between forty feet sixty feet.
3. Prior to operation of the facility and subsequently upon request of the City, the applicant shall provide documentation that radio frequency emissions comply with the FCC’s regulations or documentation of categorical exemption from environmental evaluation.
4. The applicant shall extend the addition west to connect to the adjacent existing building wall. The extended building area shall be faced in the same building materials, and shall include an access door and adequate ventilation.

**Attachment A to Report to the Hearing Examiner  
Verizon Wireless Conditional Use Permit  
Relevant Comprehensive Plan Goals and Policies**

**ECONOMIC DEVELOPMENT GOALS AND POLICIES**

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- ED 10.1:** Infrastructure. Maintain the practice of working with private property owners, neighborhood residents, and other interested public parties to determine requirements, create plans, and finance construction projects for traffic controls, roadways, sidewalks and streetscapes, stormwater, sewer, water, power, telecommunications, and other infrastructure enhancements.
- ED 10.2:** Urban design. Maintain a practice that employs the City of Snohomish Design Standards, both in the Historic District and outside of the Historic District for the design of new development. This will promote a continued relationship for preservation of the existing character of the neighborhood and the community's intention for quality construction.
- ED 10.3:** Public facilities. Maintain the practice of working with private property owners, neighborhood residents, and other interested parties to create civic master plans and programs integrating the library, school, parks, Centennial Trail, and other public facilities into the economic planning areas of the community.

**COMMUNITY FACILITIES AND SERVICES GOALS AND POLICIES**

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- CO 3.2:** Maintain the practice that Public owned or used buildings, Senior Center, Library and Cultural facilities provide the user the safest environment for public use pursuits by identifying traffic, personal injury, and other applicable safety concerns associated with a facility. Appropriate design, signing, lighting, personnel, and equipment provisions will be employed in facility development.
- CO 4.6:** Maintain the practice that public facility development will promote public safety through the use of modern design and construction practices.

**PARKS, RECREATION, AND OPEN SPACE GOALS AND POLICIES**

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- GOAL PRO 4:** Provide for maintenance of recreation sites and facilities by ensuring sufficient parks and recreation funding and staffing. Ensure that all park sites, equipment and facilities are maintained at a level that enhances public safety, maximizes equipment and facility lifespan, provides a positive park experience, and meets public expectations by providing necessary funding and staff resources.

- PRO 4.7:** Aerial utilities and telecommunication transmission infrastructure that result in

unmitigated adverse impacts are prohibited. Utility corridors and easements can offer important opportunities for recreation and open space. The City should seek opportunities to create desirable recreation facilities upon properties used principally for utilities and similar infrastructure.

## **LAND USE GOALS AND POLICIES**

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**LU 1.1:** Maintain a practice of the City using the public planning process in order to promote that all new development is located in appropriate areas in order to prevent the creation of potential nuisances, practices not to the community's standard, and hazards which might be created by the juxtaposition of incompatible land uses.

**GOAL LU 8:** **Maintain a standard that provides adequate areas for public uses such as schools and parks, so that they compatible with surrounding uses.**

**PA 8.1:** Maintain a practice that land used for public facilities should adjoin streets which have sufficient capacity to accommodate vehicular and pedestrian traffic resulting from a specific activity.

**PA 8.4:** Maintain a practice that public facilities will be encouraged that provide good site design, building design, landscaping, and off-street parking.

## **TRANSPORTATION GOALS AND POLICIES**

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**TR 1.5:** Implement a practice that the City will ensure that before any new development is approved, effect on arterials will not drop below city standards.

**TR 4.5:** Maintain a practice that the City will either prohibit development if the development causes the Level of Service on transportation facility to decline below the standards adopted in this element, or ensure that improvements are made to increase capacity.

## **UTILITIES GOALS AND POLICIES:**

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**UT 2.7:** Maintain a practice that the City will require development and construction practices that do not increase existing conditions storm water runoff.

**UT 2.8:** Maintain a practice that the City will require property owners to collect, dispose and treat storm water runoff for new construction.

**GOAL UT 4:** **Maintain a standard that facilitate the development of all utilities at the appropriate levels of service to accommodate growth that is anticipated to occur in the city.**

**UT 4.3:** Maintain a practice that the City shall encourage provision of an efficient, cost effective and reliable utility service by ensuring land will be made available for the

location of utility lines, including location within transportation corridors.

**UT 4.5:** Maintain a practice that the city shall encourage system design practices intended to minimize the number and duration of interruptions to customer service.

**GOAL UT 5:** **Maintain a standard of facilitating the provision of utilities that are environmentally sensitive, safe and reliable, aesthetically compatible with the surrounding land uses, and available at reasonable economic costs.**

**GOAL UT 6:** **Maintain a standard of processing permits and approvals for utility facilities in a fair and timely manner and in accord with the development regulations which encourage predictability.**

#### **CAPITAL FACILITIES GOALS AND POLICIES:**

**GOAL CF 1:** **The City of Snohomish shall provide needed public facilities to all residents within its jurisdiction in a manner which protects investments in existing facilities, maximizes the use of existing facilities, and promotes orderly compact urban growth.**

**CF 2.7:** The standards shall include measures of levels of service (LOS) based on trip generation and the street standards which may not be exceeded.

#### **POLICY PLAN IMPLEMENTATION GOALS AND POLICIES**

**PI 1.6:** Proposed plan amendments and requests for new development or redevelopment should be evaluated according to the following guidelines as to whether the proposed action would:

1. Contribute to a condition of public hazards;
2. Exacerbate any existing condition of public facility capacity deficits;
3. Generate public facility demands that exceed capacity in planning in the Six-Year Schedule of Improvements;
4. Conform to future land uses as shown on the future land use map of the Land Use Element;
5. Accommodate public facility demands based upon adopted LOS standards and attempt to meet specified measurable objectives, when public facilities are developer-provided;
6. Demonstrate financial feasibility, subject to this element, when public facilities are provided, in part or whole, by the City;
7. Affect state agencies' facilities plans and siting of essential public facilities; and
8. Affect significant cultural and scenic resources and critical natural area.

**PI 1.7:** Citizens will be encouraged to participate in all phases of the planning policy, formulation and revision phases as well as plan implementation.